1 2 3 4 5 6 7 8	Jeffrey L. Hartman, Esq. Nevada Bar No. 1607 HARTMAN & HARTMAN 510 W. Plumb Lane, Suite B Reno, NV 89509 T: (775) 324-2800 F: (775) 324-1818 notices@bankruptcyreno.com Attorney for Christina Lovato, Chapter 7 Trustee	Michael S. Budwick, Esq. Florida Bar No. 938777 (admitted pro hac) mbudwick@melandbudwick.com Solomon B. Genet, Esq. Florida Bar No. 617911(admitted pro hac) sgenet@melandbudwick.com Gil Ben-Ezra, Esq. Florida Bar No. 118089 (admitted pro hac) gbenezra@melandbudwick.com MELAND BUDWICK, P.A. 3200 Southeast Financial Center 200 South Biscayne Boulevard Miami, Florida 33131 T: (305) 358-6363 F: (305) 358-1221
10		Attorneys for Christina Lovato, Chapter 7 Trustee
11	UNITED STATES BANKRUPTCY COURT	
12	DISTRICT OF NEVADA	
13	In re	Lead Case No.: BK-19-50102-gs
14	DOUBLE JUMP, INC.	(Chapter 7)
15	Debtor.	Substantively Consolidated with:
16		19-50130-gs DC Solar Solutions, Inc.
17	X Affects DC Solar Solutions, Inc.	19-50131-gs DC Solar Distribution, Inc. 19-50135-gs DC Solar Freedom, Inc.
18	X Affects DC Solar Distribution, Inc.	
19	X Affects DC Solar Freedom, Inc. X Affects Double Jump, Inc.	DECLARATION OF SETH R. FREEMAN IN SUPPPORT OF TRUSTEE CHRISTINA
20	1	LOVATO'S MOTION TO ESTABLISH PROTOCOL FOR PRODUCTION OF
21		DOCUMENTS
22	I, Seth R. Freeman, hereby declare under penalty of perjury as follows:	
23	·	
24	1. I am a Managing Director at GlassRatner Advisory & Capital Group LLC, dba B.	
25	Riley Advisory Services ("B. Riley Advisory").	
26	2. The following facts are based on my personal knowledge or on information	
27	provided to me by certain third-parties in connection with the above-captioned, substantively-	
28	consolidated Bankruptcy Case ("Bankruptcy Case").	

I. B. Riley Advisory's Relationship To The Debtors

- 3. On January 25, 2019, B. Riley Advisory was retained to provide me as the Debtors' Chief Restructuring Officer ("*CRO*") and to act as Financial Advisor for DC Solar Solutions, Inc., DC Solar Distribution, Inc., DC Solar Freedom, Inc., and Double Jump, Inc. ("*Debtors*").
- 4. In later January and early February 2019, the Debtors filed for chapter 11 relief before this court commencing this Bankruptcy Case. On March 22, 2019, the Court converted the Bankruptcy Cases under chapter 7 and appointed Trustee Christina Lovato ("*Trustee*").
 - 5. B. Riley Advisory Services currently serves as the Trustee's financial advisor.

II. The Debtors' Books And Records

- 6. On December 18, 2018, federal agencies (the "U.S.A.") raided (the "Raid"), inter alia, DC Solar's corporate headquarters ("Headquarters") and seized much of the Debtors' books and records, including the following: (a) DC Solar's file and email server, which the U.S.A. preserved in their state as of the date of the Raid by making image copies of each ("Preserved Servers"); (b) nine electronic devices, including computers, tablets, and external hard drives owned by the Debtors (the "Seized Devices;") and (c) over 500 boxes of physical documents ("Seized Physical Documents").
- 7. he Seized Physical Documents included: (a) all of the Debtors' files located in the "central file room" located on the second floor of Headquarters; (b) files and papers located in executive offices, the accounting department office on the second floor of Headquarters; and (3) files and papers located in operational staff offices on the ground floor of Headquarters.
- 8. Following the Bankruptcy Court's conversion of the Debtors' case under chapter 7 of the Bankruptcy Code, I preserved certain physical documents not seized by the U.S.A (the

"Remaining Physical Documents"). Certain of the Remaining Physical Documents are humanresource related documents containing information about DC Solar's former employees.

9. The U.S.A. did not seize 58 electronic devices, including laptops, tablets, and computers, which were present at Headquarters on my arrival at DC Solar's headquarters. ("Remaining Devices").

III. The Trustee's Receipt of The Debtors' Books and Records

10. Below is a summary of the manner in which the Trustee took possession of the Remaining Physical Documents, the Remaining Devices, and the Preserved Servers:

A. The Remaining Physical Documents

- 11. On April 2, 2019, I handed Trustee Lovato a small quantity of folders containing post-petition bank statements and other vendor statements and notices that were received by the Debtors at Headquarters between my appointment as CRO and that date.
- 12. Also on June 3, 2019, I caused all of the Remaining Physical Documents to be packed into 34 boxes and shipped to the Trustee's secure storage facility in Reno, Nevada, save for certain reference documents which I maintained possession of in furtherance of the Trustee's investigation; I shipped those reference documents to Trustee's counsel, Jeffrey Hartman, on July 14, 2021.

B. Electronically Stored Information

13. On March 9, 2021, the Trustee's counsel, Jeffrey Hartman, received a hard drive containing an image copy of each of the Preserved Servers.

- 14. On January 9, 2021, I received from Trustee Donald Gieseke¹ a copy of a hard drive containing an image copy of the U.S.A.'s scans of the documents contained in 350 out of the over 500 boxes worth of Seized Physical Documents (the "Scanned Physical Documents") and a hard drive containing the U.S.A.'s image copy of the Preserved Servers..
- 15. Additionally, on January 27 and 28, 2021, I went to the FBI Sacramento Annex office located at 20001 Freedom Way Roseville, CA 95678 to inspect certain documents in the U.S.A.'s possession, and scanned certain of those documents to a hard drive attached to my laptop computer ("Additional Scanned Documents"); on March 25, 2021, I delivered the contents of the hard drive electronically to the Trustee.

C. Electronic Devices

- 16. On June 3, 2019, I shipped the Remaining Devices to the Trustee's secure storage facility in Reno, Nevada.
- 17. The Trustee does not have possession of the Seized Physical Devices, nor has she received image copies of them.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on: <u>July 15, 2021</u>.

By:

Seth R. Freeman, CIRA, CTP

GlassRatner Advisory & Capital Group, LLC,

dba B. Riley Advisory Services

425 California Street, Suite 900 San Francisco, CA 94556

¹ Trustee Donald Gieseke was appointed as trustee for the following entities: 140 Mason Circle, LLC, 475 Channel Road, LLC Brandy Boy Properties, LLC, Dog Blue Properties, LLC, Dora Dog Properties, LLC, Park Road, LLC.